

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Thomas J. Tucker
)	
_____)	

**STIPULATION FOR THE ENTRY OF AN ORDER MODIFYING THIS COURT'S
NOVEMBER 25, 2015 ORDER (DOCKET NUMBER 10286)**

The City of Detroit, Michigan ("City"), AFSCME Council 25 and Its Affiliated Detroit Locals ("AFSCME") and the Coalition of Detroit Unions ("Coalition") stipulate and agree as follows:

A. On February 21, 2014, AFSCME filed proof of claim 2958 ("AFSCME Claim") which was comprised of 20 components. On that same date, the Coalition filed proof of claim 2851 ("Coalition Claim").

B. On May 29, 2015, this Court entered its Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals (Doc. No. 9900).

C. On July 19, 2015, this Court entered the Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10071).

D. On September 30, 2015, this Court entered the Order Modifying Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10219).

E. On November 25, 2015, this Court entered the Order Modifying This Court's September 30, 2015 Order (Doc. No. 10286) ("Order").

After the entry of the Order, the parties continued their productive discussions regarding the resolution of the Coalition Claim and the AFSCME Claim. Counsel to AFSCME and the Coalition had been extremely busy in mediations conducted by Judge Victoria Roberts, (which are now concluded) and which have transitioned into a daily trial before the Michigan Employment Relations Commission (MERC). Judge Roberts has ordered that the MERC conclude its matters by March 18, 2016. Counsel for AFSCME has been lead counsel in proceedings at MERC and therefore has been unable to conclude the resolution of this matter.

NOW, THEREFORE, the City, AFSCME and the Coalition stipulate and agree as follows:

1. The filing deadlines in paragraph 1.A of the Order are extended from January 29, 2016, to April 29, 2016.
2. The filing deadlines in paragraph 1.B of the Order are extended from March 30, 2016, to June 30, 2016.
3. The filing deadlines in paragraph 1.C of the Order are extended from April 29, 2016, to July 29, 2016.

4. The filing deadlines in paragraph 1.D of the Order are extended from February 12, 2016, to May 12, 2016.

SO STIPULATED:

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DATED: January 28, 2016

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**ORDER MODIFYING THIS COURT’S NOVEMBER 25, 2015 ORDER (DOCKET
NUMBER 10286)**

This case is before the Court on the stipulation filed on January 27, 2016, entitled “Stipulation for the Entry of an Order Modifying this Court’s November 25, 2015 Order (Docket Number 10286)” (Docket # _____, the “Stipulation”). Based on the Stipulation,

IT IS ORDERED THAT:

1. The Court’s November 25, 2015 Order entitled “Order Modifying This Court’s September 30, 2015 Order (Doc. No. 10219, the “Order”) is modified as follows:
2. The filing deadlines in paragraph 1.A of the Order are extended from January 29, 2016, to April 29, 2016.
3. The filing deadlines in paragraph 1.B of the Order are extended from March 30, 2016, to June 30, 2016.
4. The filing deadlines in paragraph 1.C of the Order are extended from April 29, 2016, to July 29, 2016.
5. The filing deadlines in paragraph 1.D of the Order are extended from February 12, 2016, to May 12, 2016.